REMARKS

Rejections Under 35 U.S.C. 102

The Office Action rejects claims 1-28 as being anticipated by U.S. Patent No. 6,345,288 of Reed.

Claim 1 recites a method of operating a telecommunications system that includes sending a metadata file from a *network device* to *an external management system*, and generating a first management data file within the network device. The management data file is sent from the network device to the external management system to be processed in accordance with the metadata file.

Reed is generally directed to an automated communications system for transferring data and metadata, via a communications network, from a provider computer to a consumer computer. More specifically, Reed discloses a system that can automatically update a database in a *consumer computer* with information from a *provider computer*. The database can contain a combination of data, metadata and instructions that can be utilized to control the origination of outgoing communications and processing of incoming communications between the provider and consumer computers.

Reed, however, does not teach sending metadata from a *network device* to an *external management system* and sending a management file associated with the metadata such that the external device can process the management data in accordance with the metadata for managing the device. More particularly, in Reed's system, the consumer computer can not be considered an external management system, and is not utilized to manage the provider computer. Further, there is no indication in Reed that the metadata included in a database transferred from the provider computer to the consumer computer is related to the management of the provider computer.

Hence, Reed fails to teach or suggest salient features of claimed method, and its associated advantages. For example, the method of claim 1 allows an external management

system to dynamically learn how to manage a network device by simply employing the metadata corresponding to a management data file received from that device. This can be particularly useful when new hardware is added to a network device. In such a case, a new management data file can be sent to the external management system, together with metadata for interpreting the data file, to allow the external management system to manage the device with the new hardware without the need for rebooting.

Thus, Claim 1 distinguishes patentably over Reed. In addition, claims 2-17 depend either directly or indirectly on claim 1, and hence are also patentable over Reed.

Independent claim 18 recites a method of operating a telecommunications system, which includes the steps of sending a first plurality of metadata files from a first network device to an external management system, and generating a first plurality of management data files within the first network device. The first management data files are sent from the first network device to the external management system. Each management data file is processed in accordance with a corresponding one of the metadata files.

The arguments provided above in connection with claim 1 apply with equal force to establish that claim 18 is also patentable over Reed. In particular, claim 18 recites sending a plurality of management data files, and their associated metadata files, from a network device to an external management system to allow the management system to process each management data file in accordance with its corresponding data file – features not taught by Reed as discussed in detail above.

Moreover, claims 19-26 depend on claim 18, and hence are also patentable.

Independent claim 27 recites a telecommunications system that includes a network device having an internal management subsystem that is capable of generating a management data file and an external management system. The internal management system is capable of pushing the management data file and metadata file to the external management system, and the external management system is capable of processing data in the management data file in accordance with the metadata file.

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In Reed, there is no indication that the provider computer includes an internal management subsystem that is capable of generating a management data file and pushing the management data file and an associated metadata file to an external management system. Nor is there any indication that the consumer computer functions as an external management system that would process data in the management file in accordance with the metadata file for managing the provider computer.

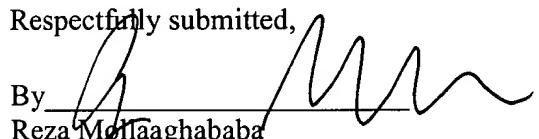Thus, claim 27 and claim 28, which depends on claim 27, are patentable over Reed.

CONCLUSION

In view of the above remarks, Applicants respectfully request reconsideration and allowance of the application. Applicants invite the Examiner to call the undersigned at (617) 439-2514 if there are any remaining issues.

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Respectfully submitted,

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